

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

DIAMOND SPORTS GROUP, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-90116 (CML)

(Jointly Administered)

**DECLARATION OF ELIZABETH C. STANTON IN SUPPORT OF RANGERS
BASEBALL EXPRESS LLC'S EMERGENCY MOTION IN LIMINE TO EXCLUDE
THE DEBTORS' LITIGATION-GENERATED PROJECTIONS CONCERNING THE
RANGERS' TELECAST RIGHTS FEES**

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors' service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

I, Elizabeth C. Stainton, declare pursuant to 28 U.S.C. § 1746 as follows:

I am an associate at the law firm White & Case LLP, counsel for Rangers Baseball Express, LLC (the “**Rangers**”). I respectfully submit this declaration (this “**Declaration**”) in support of *Rangers Baseball Express, LLC’s Emergency Motion in Limine to Exclude The Debtors’ Litigation-Generated Projections Concerning the Rangers’ Telecast Rights Fees* (the “**Motion**”) filed contemporaneously herewith.

1. Attached to this Declaration as Exhibit 1 is a true and correct copy of a redline of the Revised Declaration of Leo J. Hindery, Jr. in Support of Debtors’ Objection to (I) Emergency Joint Motion of Major League Baseball and Certain Major League Baseball Clubs to Compel Performance Under Telecast Rights Agreements, or, in the alternative, to Compel Performance or Rejection of Telecast Rights Agreements and for Relief from the Automatic Stay; (II) Emergency Motion of AZPB Limited Partnership to Compel Debtors to Perform Under the Telecast Rights Agreement, or, in the alternative, to Compel Assumption or Rejection of the Telecast Rights Agreement and Relief from the Automatic Stay; and (III) Rangers Baseball Express LLC’s Joinder to Major League Baseball and Certain Major League Baseball Clubs Limited Objection to the Debtors’ Emergency Motion to use Cash Collateral and Motion to Compel Performance dated May 26, 2023.

2. Attached to this Declaration as Exhibit 2 is a true and correct copy of excerpts of the deposition transcript of David DeVoe, dated May 15, 2023.

3. Attached to this Declaration as Exhibit 3 is a true and correct copy of the First Request of Rangers Baseball Express, LLC for Production of Documents, dated April 19, 2023.

4. Attached to this Declaration as Exhibit 4 is a true and correct copy of Diamond Sports Group, LLC's Responses and Objections to the Amended and Restated First Request of Major League Baseball and Certain Major League Baseball Clubs for Production of Documents, dated April 28, 2023.

5. Attached to this Declaration as Exhibit 5 is a true and correct copy of Diamond Sports Group, LLC's Responses and Objections to the First Request of Rangers Baseball Express, LLC for Production of Documents, dated April 28, 2023.

6. Attached to this Declaration as Exhibit 6 is a true and correct copy of a letter from counsel for the Rangers to counsel for the Debtors, dated May 3, 2023.

7. Attached to this Declaration as Exhibit 7 is a true and correct copy of an email chain among counsel for the Rangers and counsel for the Debtors, dated May 5, 2023.

8. Attached to this Declaration as Exhibit 8 is a true and correct copy of an email from counsel for the Rangers to counsel for the Debtors, dated May 17, 2023.

9. Attached to this Declaration as Exhibit 9 is a true and correct copy of an email chain among counsel for the Rangers and counsel for the Debtors, dated May 19, 2023.

10. Attached to this Declaration as Exhibit 10 is a true and correct copy of a letter from counsel for the Debtors to counsel for the Rangers, dated May 23, 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 27, 2023
New York, New York

/s/ Elizabeth C. Stainton
Elizabeth C. Stainton

EXHIBIT 1

(Filed Under Seal)

EXHIBIT 2

(Filed Under Seal)

EXHIBIT 3

(Filed Under Seal)

EXHIBIT 4

(Filed Under Seal)

EXHIBIT 5

(Filed Under Seal)

EXHIBIT 6

(Filed Under Seal)

EXHIBIT 7

(Filed Under Seal)

EXHIBIT 8

(Filed Under Seal)

EXHIBIT 9

(Filed Under Seal)

EXHIBIT 10
(Filed Under Seal)